Amendments to the Drawings

The attached sheet of drawings includes changes to FIG. 1. This sheet replaces the amended sheet of FIG. 1 that was mailed on March 17, 2003. In FIG. 1, the caption "PRIOR ART" has been deleted for reasons explained in the Remarks section.

Attachment: Replacement sheet

Remarks

The Advisory Action mailed October 9, 2003, has been reviewed and carefully considered. Claim 32 (and dependent claims thereof) has been amended for purposes of clarification. Support for the amendment to the claims is found throughout the specification such as, for example, at page 8, lines 24-25, page 10, lines 22-24, page 12, lines 3-6, and FIGS. 1 and 2, each of which show a system. In addition, FIG. 1 has been amended. The amendment to FIG. 1 clarifies that FIG. 1 depicts a conventional chemical vapor deposition system except for the presence of an ionic liquid solvent 40 in vessel 42. The ionic liquid solvent clearly does not form part of the "prior art," and thus, upon further review, FIG. 1 should not be labeled "PRIOR ART" as requested by the examiner in the Office action mailed December 17, 2002. Entry of these amendments is respectfully requested.

Claims 31-32, 45-46 and 51-52 stand rejected under 35 U.S.C. §103 over the admitted prior art in view of Freemantle. This rejection is traversed because there would have been no suggestion in the prior art to combine the admitted prior art and Freemantle to arrive at the claimed invention.

It is noted that claim 32 (and dependent claims thereof) recite a "system" as a whole rather than an apparatus. The system includes an ionic liquid source, not just a vessel containing an ionic liquid. Thus, these claims should be considered from the viewpoint of an overall system rather than a single aspect of a substrate processing tool.

The examiner recognizes that the admitted prior art apparatus does not include an ionic liquid source and, thus, Freemantle is relied upon as supplying this missing piece. Freemantle, though, simply discusses ionic liquid without any mention of any system or apparatus whatsoever, much less a vapor deposition system or apparatus as claimed. A reference that fails to even hint at any type of system or apparatus could hardly have suggested a modification to another system or apparatus.

Indeed, Freemantle is nonanalogous art with respect to claims directed to a system or apparatus. A discussion of ionic liquids certainly is not within the field of vapor deposition systems or apparatus. Nor is it apparent from the references that Freemantle is reasonably pertinent to the problems solved by the presently claimed system or apparatus. As discussed in applicant's previous responses, it is the applicant that first made the connection between the

properties of ionic liquids and the advantages such properties offered to vapor deposition. Thus, it is the applicant rather than the prior art that first recognized the relevancy of ionic liquids to the problems of vapor deposition.

In the Advisory Action, the examiner recognizes that "Freemantle may not disclose specific applications." However, according to the examiner, the advantageous properties of ionic liquids that are mentioned by Freemantle would have suggested that ionic liquids could be used in a variety of applications. The shortcoming of this argument is that such a suggestion simply amounts to an "obvious to try" approach at most (see MPEP §2145 admonishing against an "obvious to try" rationale). The only use disclosed in Freemantle for ionic liquids is as a medium for performing catalyzed organic reactions. Such reactions would not be performed in a system or apparatus even remotely similar to that presently claimed.

For these reasons and the additional arguments presented in applicant's previous responses, the pending 35 U.S.C. §103 rejection over claims 31-32, 45-46 and 51-52 must be withdrawn.

Claims 47 and 53 remain rejected under 35 U.S.C. §103 over the admitted prior art combined with Freemantle and Blomgren et al. Claims 48 and 54 remain rejected under 35 U.S.C. §103 over the admitted prior art combined with Freemantle and Jones et al. Claims 50 and 56 remain rejected under 35 U.S.C. §103 over the admitted prior art combined with Freemantle and Abdul-Sada et al. As pointed out in applicant's response mailed September 22, 2003, on page 6 of the May 22, 2003, Office action, the examiner states that Blomgren et al., Jones et al. and Abdul-Sada et al. are "used to show typical ionic liquid sources and are not relied upon to show the use of ionic liquid sources in any particular application." However, in the context of the present system or apparatus claims, the use of ionic liquid is very relevant. The present claims are directed to vapor deposition systems or apparatus. Since none of these secondary references relate to vapor deposition systems or apparatus, they would not have prompted a person of ordinary skill in the art to modify a vapor deposition system or apparatus.

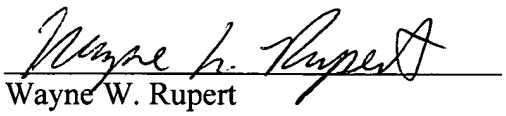
Claim 57 is rejected under 35 U.S.C. §103 over the admitted prior art combined with Freemantle and Ballingall III. Ballingall III is relied upon simply to show a system or apparatus that includes two different precursor sources. Ballingall III does not cure the previously-explained deficiencies in the admitted prior art and Freemantle. Accordingly, the 35 U.S.C.

§103 rejection of claim 57 should be reconsidered and withdrawn.

It is respectfully submitted that the present claims are in condition for allowance. Should there be any questions regarding this application, Examiner Alejandro-Mulero is invited to contact the undersigned attorney at the telephone number shown below.

Respectfully submitted,

KLARQUIST SPARKMAN, LLP

By 
Wayne W. Rupert
Registration No. 34,420

One World Trade Center, Suite 1600
121 S.W. Salmon Street
Portland, Oregon 97204
Telephone: (503) 226-7391
Facsimile: (503) 228-9446